

BARRY, MCTIERNAN & MOORE

COUNSELORS AT LAW

2 RECTOR STREET

WESTCHESTER OFFICE
55 CHURCH STREET
WHITE PLAINS, NY 10601
TEL: (914) 946-1030
FAX: (914) 946-3814

NEW YORK, NEW YORK 10006

TEL: (212) 313-3600
FAX: (212) 608-8901
FAX: (212) 608-8902 (TOXIC TORT)

CONNECTICUT OFFICE
27 LONG MEADOW ROAD
TRUMBULL, CT 06611
TEL: (203) 261-8060
FAX: (203) 268-0384

May 29, 2012

Via ECF

Chief Magistrate Steven M. Gold
United States District Court
Eastern District of New York
225 Cadman Plaza, East
Brooklyn, NY 11201

Re: Rodriguez v. the City of New York
P.A. Jr. v City of New York
Alford v City of New York
10 CV 4661 and 11 CV 1583

Dear Judge Gold:

Your Honor had directed the parties to submit a final deposition plan by today. The schedule is still not finished, although I did send all counsel a tentative schedule today and have heard no objection. We are still waiting to hear from Mr. Lambert about when Mr. Alford will be available to be deposed (we had suggested several dates last week before his surgery, but no dates could be worked out). I also have had some delays in scheduling some of my Emergency Children's Services (ECS) workers due to their night and weekend schedules.

I therefore request an additional week to submit the final deposition plan. Thank you for your consideration.

Respectfully submitted,
BARRY, MCTIERNAN & MOORE

By: Suzanne M. Halbardier
Suzanne M. Halbardier

cc: Via ECF
Robert Alexander Osuna, Esq.
Skadden Arps Slate Meagher & Flom LLP
James Lambert
Attorneys for Plaintiffs

Charles E. O'Bryan, Esq.
Jones, Hirsch, Connors & Bull, P.C.
Attorneys for Defendants St. Vincent's Services, Inc.